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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JESSICA JANE GRIDER,)	Case No. 1:22-cv-00781-EPG
)	
Plaintiff,)	STIPULATED MOTION AND ORDER
)	FOR EXTENSION OF TIME
vs.)	(ECF No. 13)
)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from December 12, 2022 to February 10, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR). A review of the records received shows Counsel has received at least 50 CARs, the majority of which were filed in June 2022. This has caused an unusually large number of

1 cases that have merit briefs due in the months of August and September. For the months of
2 September and October 2022, we have received an additional 39 CARs.

3 For the weeks of December 5, 2022 and December 12, 2022, Counsel currently has 13
4 merit briefs, and several letter briefs and reply briefs. Additional time is needed to thoroughly
5 brief this matter for the Court. Also, as previously reported, Counsel for Plaintiff underwent
6 major orthopedic surgery in March 2022, requiring significant physical therapy. This has
7 required Plaintiff's counsel to take time off during the work week and work months since then.
8 Although much improved, Counsel still participates in regular physical therapy two to three
9 times per week.

10 Lastly, Counsel for Plaintiff is currently taking partial leave as his child was born on
11 October 14, 2022. Thus, Counsel is working limited hours for the months of December 2022 and
12 January 2023. Additionally, Counsel for the Plaintiff has pre-planned Christmas vacation during
13 the last two weeks of the year, with limited access to the computer.

14 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant
15 and Court for any inconvenience this may cause.

16
17 Respectfully submitted,

18 Dated: December 7, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

19
20 By: /s/ Jonathan Omar Pena
21 JONATHAN OMAR PENA
22 Attorneys for Plaintiff

23 Dated: December 7, 2022

24 PHILLIP A. TALBERT
25 United States Attorney
26 MATHEW W. PILE
27 Associate General Counsel
28 Office of Program Litigation
Social Security Administration

By: */s/ Mary Tsai
Mary Tsai
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on Dec. 7, 2022)

ORDER

Based on the above stipulation (ECF No. 13), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment by no later than February 10, 2023. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **December 8, 2022**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE